

# JAMMEDIASOLUTIONS

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## BY ELECTRONIC FILING

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

## COMMENTS

Re: *Comment on Recent Filings Concerning Use of FM Boosters for Geo-Targeted Content*, MB  
Dkt. Nos. 20-401, 17-105, Public Notice, DA 22-429 (2022) (*Public Notice*).

Dear Ms. Dortch:

As indicated in an *ex parte* filing by the National Association of Black Owned Broadcasters (NABOB) last Friday, I had the pleasure of attending a meeting with Chairwoman Rosenworcel and her staff to urge adoption of a modification to the FCC's FM radio booster rules that would permit broadcasters like me, **on a voluntary basis**, to geotarget our listeners several minutes an hour with hyper-local news, weather, and traffic reports. Importantly, the rule change will also enable me and other small broadcasters to expand more efficiently into hyper-local ads.

The ability to geotarget ads to our listeners is critical for me at a time when many small broadcasters, especially minority-owned broadcasters, are losing local ad dollars to other media platforms that can and do geotarget today, especially Big Tech. Geotargeting also helps small, local businesses by drawing them to those radio stations that offer geotargeting solutions. This is why the National Newspaper Publishers Association (NNPA), led by Dr. Ben Chavis, has joined NABOB in urging adoption of the rule change.

As I said in our meeting, many radio stations are in "hospice care." The current state and outlook for the radio industry is not good, and provides an important basis for the rule change. BIA Advisory Services estimates the local advertising spend for 16 different media in its BIA ADVantage™ platform. This includes traditional media, (radio, TV, cable TV, direct mail, directories, magazines, newspapers, out-of-home) as well as digital media (email, digital magazines, mobile, digital newspaper, OTT, PC/laptop, digital radio and digital TV).

BIA estimates that local advertising in the U.S. has grown from \$148.5 billion in 2019 and will reach \$167.4 billion in 2022. This represents a 4.1% compound annual growth rate ("CAGR") over this three-year period and was clearly impacted by the pandemic. BIA projects local advertising to grow to \$210.2 billion in 2026, representing a 7.9% CAGR. Over-the-air ("OTA") radio advertising, on the other hand, has not fared so well and will be relatively flat through 2026. BIA estimates that radio OTA declined from \$12.7 billion in 2019 to \$11.2 billion in 2022, a -4.4% CAGR. Local radio advertising is forecast to be \$11.6 billion in 2026, growing at a 1.2% CAGR from 2022. Radio OTA's share of local advertising has declined from 8.6% in 2019 to 6.7% in 2022 and is forecast to be 5.5% in 2026.

While radio has struggled to grow local advertising, other media, those capable of geotargeting, have grown much more rapidly. For example, from 2019 to 2022, digital media has grown its local

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advertising from \$46.8 billion to \$67.0 billion, a 12.6% CAGR. BIA forecasts local advertising on digital media to grow at a 13.8% CAGR through 2026.

In summary, the local radio industry is struggling to grow its share of local advertising. Geotargeting can help to reverse that trend and begin repair of the radio industry. I urge the FCC to consider the broader and deeper functioning of today's modern local advertising marketplace that driven by data, targeting, audience segmentation beyond age and gender and the need for local radio to embrace technological innovation such as over-the-air geotargeted content in order for it to become more competitive, provide more relevant content to audiences and advertisers, better serve the needs of local communities and have a new path to revenue and market share growth.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan M. [unclear]", with a long horizontal flourish extending to the right.